

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

KINGERY PRINTING COMPANY,	)	
	)	
Plaintiff,	)	Case No.: 3:24-cv-2328-SPM
	)	
vs.	)	
	)	
THE LAMPO GROUP, LLC a/k/a RAMSEY	)	
SOLUTIONS,	)	
	)	
Defendant.	)	

**JOINT MOTION TO STAY PROCEEDINGS**

Plaintiff Kingery Printing Company (“Kingery”) and Defendant The Lampo Group, LLC a/k/a Ramsey Solutions (“Ramsey Solutions”) (collectively, the “Parties”) respectfully request that this Court stay this action for 60 days so that the Parties can memorialize and implement a settlement. In support of this Motion, the Parties state as follows:

1. Kingery filed this action on September 13, 2024. Ramsey Solutions removed the action to this Court on October 16, 2024.
2. The Court has granted two extensions of time for Ramsey Solutions to file a responsive pleading in order to allow the Parties to explore the potential for a settlement. Ramsey Solutions’ responsive pleading currently is due December 4, 2024.
3. On November 18, 2024, the Parties reached a settlement in principle that will fully and finally resolve this dispute.
4. The Parties are in the process of memorializing the settlement and will then implement the settlement terms, which will include transfers of certain materials between the Parties and a settlement payment. While the Parties expect a settlement agreement to be signed

shortly, the Parties expect that it will take several weeks to implement all the settlement terms (especially with the upcoming Christmas and New Year's holidays).

5. Accordingly, in order for the Parties to finalize and implement the settlement, the Parties jointly request that this Court stay this action for 60 days, through and including, February 3, 2025. If the settlement terms are carried out prior to that time, the Parties will file the necessary papers to dismiss this action, with prejudice.

6. In the unlikely event that the settlement agreement is not finalized and implemented by February 3, 2025, Ramsey Solutions will file its responsive pleading on or before February 3, 2025. Kingery will have until on or before February 24, 2025, to file a Motion to Remand the matter, should it choose to file such a motion.

7. A temporary stay will not prejudice any party, as all parties are committed to finalizing a settlement that will resolve this matter.

**WHEREFORE**, the Parties respectfully request that this Court grant this Motion enter an order staying all proceedings in this action for 60 days.

[SIGNATURE PAGE TO FOLLOW]

Dated: December 2, 2024

Respectfully submitted,

/s/ Chad E. Chojnicki

Chad E. Chojnicki

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*Counsel for Defendant The Lampo Group, LLC  
a/k/a Ramsey Solutions*

**CERTIFICATE OF SERVICE**

I, Scott T. Schutte, an attorney, certify that I filed the foregoing using the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record on this 2nd day of December, 2024.

/s/ Scott T. Schutte

Scott T. Schutte